

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SOKOL HOLDINGS, INC., BRIAN SAVAGE and
THOMAS SINCLAIR

Plaintiffs,

-against-

BMB MUNAI, INC., ALEXANDRE AGAIAN,
BAKHYTEBEK BAISEITOV, GEORGES BENARROCH,
BORRIS CHERDABAYEV, MIGALI KUNAYEV,
CREDIFINANCE CAPITAL, INC. and CREDIFINACE
SECURITIES, LTD.

Defendants.

05 CV 3749 (KMW)

**DECLARATION OF TAMARA
L. BOCK IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO
DISMISS OR STAY**

TAMARA L. BOCK declares under penalty of perjury:

1. I am a member of the Bar of this Court and associated with the firm of Dewey, Pegno & Kramarsky, LLP, counsel for plaintiffs in this action. I submit this declaration in support of Plaintiffs' Opposition to Defendants' Motion to Dismiss or to Stay , dated June 12, 2006 ("Plaintiffs' Opposition").

2. In support of Plaintiffs' Opposition, I attach hereto true and correct copies of each of the following documents:

EXHIBIT A: Declaration of Scott Horton.

EXHIBIT B: Relevant Selections from BMB Munai, Inc. Proxy Statement on Form 14A, filed with the SEC on September 20, 2004.

EXHIBIT C: Declaration of Thomas Sinclair.

EXHIBIT D: Relevant Selections from BMB Munai, Inc. Annual Report on Form 10-KSB for the year ended March 31, 2006, filed with the SEC on June 29, 2006.

EXHIBIT E: Amended Motion to Dismiss of Defendant BMB Munai, Inc.

3. In further support of Plaintiffs' Opposition, I attach hereto true and correct copies of the following documents provided to Plaintiffs by Bracewell & Giuliani, LLP counsel for Defendants:

EXHIBIT F: July 3, 2003 email from Georges Benarroch to Alexandre Agaian confirming their July 1, 2003 meeting in New York City with Bakhytbek Baiseitov.

EXHIBIT G: October 7, 2003 email from Georges Benarroch to Alexandre Agaian confirming investor meetings in New York City to finance BMB Munai, Inc.

EXHIBIT H: October 6, 2003 email from Bill MaGee of Credifinance concerning meetings in New York with Boris Chedabayev and Alexandre Agaian.

EXHIBIT I: October 6, 2003 email chain regarding investor meetings in New York for BMB at which representatives of Credifinances, Alexandre Agaian and Boris Cherdabayev attended.

EXHIBIT J: Fall, 2003, presentation to potential investors in BMB by Boris Cherdabayev and Alexandre Agaian.

EXHIBIT K: September 15, 2003 draft timetable for BMB Munai, Inc. private placement, noting August 14, 2003 New York meeting about a Letter of Intent regarding the merger of BMB Munai, Inc. and InterUnion Financial Corporation and other New York meetings.

EXHIBIT L: August 16, 2003 email from Alexandre Agaian regarding August 14, 2003 meeting in New York among Georges Benarroch and other Credifinance personnel and Alexandre Agaian and the Board of BMB Munai, Inc.

EXHIBIT M: August 5, 2003 email chain, indicating that members of BMB Munai Board of Directors, including Bakhytbek Baiseitov, Mirgali Kunayev and Boris Cherdabayev would attend a meeting in New York on August 14, 2003.

EXHIBIT N: November 4, 2003 email from law firm in New York to Brad Peach of Credifinance regarding an agency agreement for BMB

EXHIBIT O: Sub-Agency Agreement, November, 2003, between Credifinance Securities Ltd and Aton Securities, Inc. of 1180 Avenue of the Americas, New York, New York by which Aton Securities Inc. was to act as sub-agent in obtaining subscriptions to the private placement of BMB Munai, Inc. securities. The agreement to which Credifinance was a signatory includes a New York choice of law provision.

EXHIBIT P: Memorandum from Georges Benarroch re: July 1, 2003 meeting with Alexandre Agaian and Bakhytbek Baiseitov in New York, listing as "Bankers, JP Morgan Chase Bank in New York and as "corporate attorney" Lerner & Kaplan, LLP in New York.

I declare under the penalties of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed this 18th Day of July, 2006.

/s/ Tamara L. Bock
TAMARA L. BOCK